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**BACKGROUND**

4. The Janitorial Company specializes in providing janitorial services and building maintenance for businesses throughout the city of Fresno and surrounding communities.

5. The Janitorial Company hires and employs at-will workers to provide janitorial services at various commercial buildings and construction sites.

6. These at-will employees are required to drive themselves to these various cleaning sites to perform their work. There is no centralized location the employees must first report to.

7. The City Attorney’s Office of Fresno receives wage theft complaints from the community. These complaints are investigated and prosecuted when evidence is found corroborating the allegations.

8. The City Attorney’s Office of Fresno has received such allegations of Labor Code violations committed by The Janitorial Company. Two separate former employees have come forward with legally actionable claims.

**JURISDICTION AND VENUE**

9. Jurisdiction and venue are proper in the Superior Court of the State of California in the City and County of Fresno under Government Code section 11186.

10. The documents at issue are required to be produced in Fresno pursuant to Government Code section 11187.

**THE CITY ATTORNEY’S INVESTIGATIVE AUTHORITY**

11. California Assembly Bill No. 594 authorizes “public prosecutors” to prosecute specific provisions of the Labor Code. This includes bringing forth both civil and criminal actions.

12. A “public prosecutor” is defined in Division 1, Chapter 8, Section 180 of the California Labor Code as “any Attorney General, a district attorney, a city attorney, a county counsel, or any other city or county prosecutor.”

13. On February 1, 2024, Fresno City Council adopted Resolution No. 2024-025, which “directed and empowered” the City Attorney to investigate and prosecute employer wage theft occurring within the City of Fresno. This Resolution explicitly mentions California Assembly Bill 594 as the source of this new prosecutorial power.

1           14.     On April 4, 2024, the Fresno City Council approved Ordinance No. 2024-010, which  
2 added Article 6 to Chapter 1 of the Fresno Municipal Code. This newly added Article granted the  
3 City Attorney’s Office the power to “inspect, upon reasonable notice, all papers, books, accounts,  
4 records, documents, and other items that may be relevant to the City Attorney’s investigation.”

5           15.     Furthermore, Fresno Municipal Code Section 1-601(b) grants the City Attorney’s  
6 Office the power to issue subpoenas for the attendance of witnesses and “production of any papers,  
7 books, accounts, records, documents, or other items that may be relevant to the City Attorney’s  
8 investigation.”

9           16.     Fresno Municipal Code Section 1-601(c) specifies that the City Attorney may  
10 exercise these subpoena and investigatory powers “prior to or following the filing of any civil,  
11 criminal or administrative action.”

12           17.     The Janitorial Company is headquartered at 4887 W. Pinedale Avenue, which is  
13 within the incorporated area of the city of Fresno. Thus, The Janitorial Company lies within the  
14 jurisdiction of the City Attorney’s subpoena powers.

15           **THE CITY ATTORNEY’S INVESTIGATION AND SUBPOENA DUCES TECUM**

16           18.     On April 14, 2025, the Fresno City Attorney’s Office received an allegation of wage  
17 theft from a former employee of The Janitorial Company. This employee, Gabriella Leon, alleged  
18 that The Janitorial Company failed to fully compensate her for all hours worked.

19           19.     On May 6, 2025, the Fresno City Attorney’s Office received a second allegation of  
20 wage theft from a former employee of The Janitorial Company. This employee, Monica Leon,  
21 alleged the same misconduct: the company failed to pay her in full for her hours worked.

22           20.     Formal interviews were conducted of both claimants, and they provided the Fresno  
23 City Attorney’s Office with documentation corroborating their allegations.

24           21.     On July 19, 2025, a subpoena duces tecum was served on The Janitorial Company  
25 at 4887 W. Pinedale Avenue (see *Exhibit A.*) The subpoena requested the following be produced  
26 for the relevant period of June 2022 to December 2025: “[a]ll payroll documents and records,  
27 including payroll/wage records, paystubs, copies of checks, pay rate, overtime rate, payment  
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1 methods, employee policy and procedure/employee handbooks, and tax information pertaining to  
2 all employees.”

3 22. The Janitorial Company complied in part with the subpoena duces tecum on August  
4 11, 2025. The Janitorial Company provided the City Attorney’s Office with payroll summaries of  
5 their organization for the time period requested. No other documents were provided, besides the  
6 “employee handbook.”

7 23. On September 26, 2025, a follow-up letter was sent to both the mailing address and  
8 headquarters associated with The Janitorial Company (PO Box 11847, Fresno, CA 93775 and 4887  
9 W. Pinedale Ave., Fresno, CA 93722). This letter informed the company that their response to the  
10 subpoena duces tecum was incomplete, and failed to provide the following: “(1) employees  
11 itemized wage statements (paystubs) for the period requested; (2) records showing total hours  
12 worked per day and pay period; (3) rates of pay; (4) overtime hours worked and compensation  
13 received; (5) deductions made from wages; and (6) employee job classifications.” (see *Exhibit B.*)

14 24. On December 1, 2025, after receiving no additional documents from The Janitorial  
15 Company, the City Attorney’s Office sent a demand letter to both the headquarters and mailing  
16 address of The Janitorial Company. (see *Exhibit C.*) The letter reiterated The Janitorial Company’s  
17 failure to comply with the initial subpoena duces tecum and requested the missing documents for a  
18 second time.

19 25. As of today, January 21, 2026, the City Attorney’s Office has yet to receive the  
20 subpoenaed records requested from The Janitorial Company.

21 **DOCUMENTS BEING SOUGHT**

22 26. The City Attorney’s Office is seeking—for the relevant period of June of 2022 to  
23 December of 2025: (1) employees itemized wage statements (“paystubs”); (2) records showing total  
24 hours worked per day and pay period; (3) rates of pay; (4) overtime hours worked and compensation  
25 received; (5) deductions made from wages; and (6) employee job classifications.

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**DECLARATION OF BRANDON RETA**

I, Brandon Reta, declare as follows:

1. I am a Deputy City Attorney for the City of Fresno.

2. The City Attorney’s Office of Fresno has received information that The Janitorial Company may have engaged in behaviors violating the California Labor Code.

3. The City Attorney’s Office, pursuant to California Government Code section 11180, authorized an investigation of possible violations relating to business practices and subjects under the jurisdiction of the California Department of Justice.

4. As of the filing of this motion, the City Attorney’s Office has yet to receive any documents listed in the “Documents Being Sought” section from the Respondent, The Janitorial Company.

5. The facts set forth herein are personally known to me, and I have first-hand knowledge of the same.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**Dated:** January 29, 2026



Brandon N. Reta

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# EXHIBIT A

Attorney or Party without Attorney:

HyunJin Malcolm, Deputy City Attorney, SBN: 354890  
ANDREW JANZ, City Attorney CITY OF FRESNO  
2600 FRESNO STREET  
FRESNO, CA 93721

TELEPHONE No.: (559) 621-7500

FAX No. (Optional): (559) 488-1084

E-MAIL ADDRESS (Optional):

Attorney for:

Ref No. or File No.:

FOR COURT USE ONLY

Insert name of Court, and Judicial District and Branch Court:

None -

Plaintiff:

Defendant:

<b>PROOF OF SERVICE</b>	HEARING DATE:	TIME:	DEPT.:	CASE NUMBER:
				WT25-0004

AT THE TIME OF SERVICE I WAS AT LEAST 18 YEARS OF AGE AND NOT A PARTY TO THIS ACTION  
I SERVED COPIES OF THE FOLLOWING DOCUMENTS:

**DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

PARTY SERVED: **The Janitorial Company**

PERSON SERVED: **Kamaljit Singh - Owner**

DATE & TIME OF DELIVERY: **7/19/2025**  
**1:14 PM**

ADDRESS, CITY, AND STATE: **4887 W. Pinedale Ave.**  
**Fresno, CA 93722**

PHYSICAL DESCRIPTION:	<b>Age: 63</b>	<b>Weight: 175</b>	<b>Hair: Black</b>
	<b>Sex: Female</b>	<b>Height: 5'5</b>	<b>Eyes: Brown</b>
	<b>Race: Indian</b>	<b>Marks:</b>	

**MANNER OF SERVICE:**

Personal Service - By personally delivering copies.

Fee for Service: \$ 69.50

County: FRESNO

Registration No.: S201110000012



Eddings Attorney Support Services, Inc.  
1099 East Champlain Dr., Suite A-102  
Fresno, CA 93720  
(559) 222-2274

I declare under penalty of perjury under the laws of the  
The State of California that the foregoing information  
contained in the return of service and statement of  
service fees is true and correct and that this declaration  
was executed on July 21, 2025.

Signature: *Aindra Evans*  
AINDRA EVANS

**PROOF OF SERVICE**

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# EXHIBIT B



Andrew Janz  
City Attorney

September 26, 2025

The Janitorial Company

4887 W Pinedale Ave. Fresno, CA 93722  
Mailing Address: PO Box 11847 Fresno, CA 93775

Re: City of Fresno's Wage Protection Program Investigation  
City Case Number WT25-0004

Dear The Janitorial Company,

We are following up on our previous subpoena request regarding employment records for the above business between: June 2022-Present.

We acknowledge receipt of your response to our prior subpoena; however, the documents provided were **incomplete** and **did not include all of the records requested**. As such, we are reiterating our request and formally requesting that you provide the following documentation, which employers are required to maintain pursuant to California Labor Code 226 and 1174:

1. Employees itemized wage statements (paystubs) for the period requested
2. Records showing total hours worked per day and pay period
3. Rates of pay (including any changes to rates)
4. Overtimes hours worked and compensation received
5. Deductions made from wages
6. Employee job classifications
7. Any other payroll or personnel records that pertain to employee wages and hours worked

As you are aware, Labor Code section 1174 requires that employers retain these records for a minimum of three years. Failure to provide these records may result in legal action.

City of Fresno  
Wage Protection Program  
(559) 621-7599

Please submit the complete set of records to the **Fresno City Attorney's Office 2600 Fresno Street, Suite 2031 Fresno, CA 93721** or via email to [wagetheft@fresno.gov](mailto:wagetheft@fresno.gov) by no later than **October 13, 2025**. If you require clarification, you may contact me directly.

Thank you for your prompt attention to this matter and appreciate your cooperation.

Sincerely,



Brandon Reta  
*Deputy City Attorney*

Andrew Janz, City Attorney  
By: Brandon Reta, Deputy City Attorney (339039)  
City of Fresno-City Attorney's Office  
2600 Fresno Street, Fresno, CA 93721  
Phone (559) 621-7599  
Email [brandon.reta@fresno.gov](mailto:brandon.reta@fresno.gov)



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## NOTICE TO SUBPOENAED PARTY

You have been served with a

### **Deposition Subpoena for Production of Business Records**

**IMPORTANT: YOU MUST COMPLY WITH THIS REQUEST ON OR BEFORE THE  
DEPOSITION DATE OF:**

October 13, 2025

**You must complete and sign the Affidavit-Declaration of Records (attached)**

YOU MAY PROVIDE REQUESTED RECORDS:

- **MAILED OR PERSONALLY SERVED TO:**  
Fresno City Attorney's Office 2600 Fresno Street, Suite 2031 Fresno, CA 93721
- **EMAILED TO:** [wagetheft@fresno.gov](mailto:wagetheft@fresno.gov)

**If no records are available, you MUST still send back the signed Affidavit.**

Please read all of the attached documents. If you have any questions, you may contact the issuing attorney or our office directly at **559-621-7599**. If you require additional time to complete this request, please notify the issuing attorney or our office immediately.



Andrew Janz, City Attorney  
 By: Brandon Reta, Deputy City Attorney (339039)  
 City of Fresno-City Attorney's Office  
 2600 Fresno Street, Fresno, CA 93721  
 Phone (559)621-7599  
 Email brandon.reta@fresno.gov



TO:  
 The Janitorial Company  
 4887 W Pinedale Ave  
 Fresno, CA 93722  
 Mailing Address: PO Box 11847  
 Fresno, CA 93775

**DEPOSITION SUBPOENA  
 FOR PRODUCTION OF BUSINESS RECORDS**

CAO Case Number: WT25-0004

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:  
 To: Fresno City Attorney's Office Attn: Brandon Reta, Deputy City Attorney  
 At (time): 10:00 a.m.  
 On: (Date) October 13, 2025  
 Location (address): 2600 Fresno Street, Suite 2031, Fresno, CA 93721
2. The records are to be produced by the date and time shown in item 1 by delivering a true, legible, and durable copy of the business records described in item 3 to the address set forth above. The records shall be accompanied by an affidavit of the custodian of records or other qualified witness pursuant to California Evidence Code Section 1561.
3. The records that need to be generated are outlined as follows: For every employee, both current and former: comprehensive payroll and/or wage records, paystubs, check copies, pay rates, overtime rates, methods of payment, employee policies and procedures/employee handbooks, as well as tax information. Time frame: June 2022 – Present
4. Pursuant to City of Fresno Municipal Code Section 1-602(a), unless otherwise prohibited by federal or state law, in investigating, enforcing or prosecuting any matter where federal or state law grants or affords to the City Attorney, the duty or power to investigate, enforce, or prosecute any matter under federal or state law, the City Attorney shall have the power to inspect, upon reasonable notice, all papers, books, accounts, records, documents or other items that may be relevant to the City Attorney's investigation, enforcement action or prosecution. (b)The City Attorney shall also have the power to issue subpoenas for the attendance of witnesses, to compel their attendance and testimony, to administer oaths and affirmations, to take evidence, and to issue subpoenas for the production of any papers, books, accounts, records, documents or other items that may be relevant to the City Attorney's investigation, enforcement action or prosecution.  
 (Added Ord. 2024-010, § 1, eff. 5-10-24).

SEC. 1-603. - ENFORCEMENT.

DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

If any person refuses or fails to comply with a subpoena of the City Attorney issued pursuant to this Article, the City Attorney may petition any court of competent jurisdiction for an order compelling the person to attend and testify or produce the books, papers, records, accounts, documents, or other items required by the subpoena before the officer named in the subpoena.

Dated: 09/22/2025

ANDREW JANZ  
City Attorney

By: Brandon Reta  
Brandon Reta  
Deputy City Attorney

**DECLARATION OF CUSTODIAN OF RECORDS**

Records pertaining to: The records that need to be generated are outlined as follows: For every employee, both current and former: comprehensive payroll and/or wage records, paystubs, check copies, pay rates, overtime rates, methods of payment, employee policies and procedures/employee handbooks, as well as tax information. Time frame: June 2022 – Present

Name of Facility/Location:

Address:

Phone:

I, the undersigned, being duly authorized custodian of records or other qualified witness in the employ of the above-named business and having the authority to certify the records declare the following:

**CERTIFICATION OF RECORDS COPIED**

- That as of the day of this declaration, the attached  documents,  videos,  photos,  audio, as given to the Fresno City Attorney’s office, are a true copy of all records described in the Subpoena and/or Authorization which were kept and maintained by the facility in the usual course of business.
- That as of the day of this declaration, the attached  documents,  videos,  photos,  audio, as given to the Fresno City Attorney’s office, are a true copy of part of the records described in the Subpoena and/or Authorization which were kept and maintained by the facility in the usual course of business, with the exception of:

**CERTIFICATION OF NO RECORDS**

- That a thorough search of our files made by me or under my direction and control revealed no records, documents or things described in the Subpoena and/or Authorization. And, it is understood that this declaration is limited to the information supplied to me in the attached Subpoena and/or Authorization; such records may exist under another name, spelling or identifying date.
- Records described in the Subpoena and/or Authorization did exist, however these records are not available to copy because:

**UNABLE TO COMPLETE REQUEST BECAUSE:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I DECLARE UNDER PENALTY OF PERJURY AND UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on \_\_\_\_\_, 2025, at Fresno, California.  
(Date)

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

[Decl-Custodian of Records]

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# EXHIBIT C



Andrew Janz  
City Attorney

December 1, 2025

## DEMAND FOR COMPLIANCE WITH SUBPOENA DUCES TECUM

The Janitorial Company  
4887 W. Pinedale Ave., Fresno, CA 93722  
Mailing Address: P.O. Box 11847, Fresno, CA 93775

Re: City of Fresno's Wage Protection Program Complaint  
City Case Number WT25-0004

Dear Janitorial Company:

The City of Fresno's Wage Protection Program served a subpoena duces tecum on *The Janitorial Company* at 4887 W. Pinedale Ave., Fresno, California on July 19, 2025. A response to the subpoena was due by October 13, 2025. To date, the City of Fresno has not received the requested documents.

Pursuant to Fresno Municipal Code §1-602, the Fresno City Attorney's Office has the authority to subpoena the production of business records and other documents relevant to a City Attorney's investigation into wage theft. Your business has failed to comply with the subpoena. **Please allow this letter to serve as the City's demand for compliance with the subpoena.**

The follow-up request for specific documents was a result of missing records from the first served subpoena. In order to assess all information correctly, we require all information requested. Please ensure timekeeping records are included for ALL employees. The documents requested are as follows:

- Employees itemized wage statements (paystubs) for the period requested
- Records showing total hours worked per day and pay period
- Rates of pay (including any changes to rates)
- Overtimes hours worked and compensation received
- Deductions made from wages
- Employee job classifications
- Any other payroll or personnel records that pertain to employee wages and hours worked

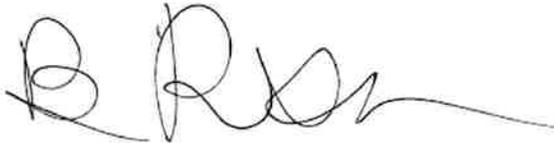
Please also note that you shall not delete, destroy, or discard any potential evidence that relates to the claim, facts, or defenses relating to this project. This includes, but is not limited to, any relevant electronic evidence, such as text messages, social media posts, emails, or voicemails. If you have a policy or practice of regularly deleting, destroying, or discarding documents, information, or things, these policies or practices should be suspended in relation to any potential evidence. Deleting, destroying, or discarding any potential evidence is against the law.

**Please provide our office with the requested documentation no later than December 17, 2025. You can produce these documents electronically via email to [wagetheft@fresno.gov](mailto:wagetheft@fresno.gov) or drop them off in person at Fresno City Hall, 2600 Fresno Street, Rm. 2031, Fresno, California 93721.**

It is our hope that The Janitorial Company will produce the remainder of the records requested in compliance with the subpoena and avoid the City moving forward in the judicial process to compel disclosure. The City reserves all rights and remedies available to it.

If you have any questions regarding this notice, feel free to reach out to our office at [wagetheft@fresno.gov](mailto:wagetheft@fresno.gov) or (559) 621-7599.

Sincerely,



Brandon N. Reta,  
*Deputy City Attorney*

Enclosures:

1. Subpoena Duces Tecum and Declaration
2. 09-26-25 Request for Production of Documents (Follow-up)



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## NOTICE TO SUBPOENAED PARTY

You have been served with a

### **Deposition Subpoena for Production of Business Records**

**IMPORTANT: YOU MUST COMPLY WITH THIS REQUEST ON OR BEFORE THE**

**DEPOSITION DATE OF:**

October 13, 2025

**You must complete and sign the Affidavit-Declaration of Records (attached)**

YOU MAY PROVIDE REQUESTED RECORDS:

- **MAILED OR PERSONALLY SERVED TO:**  
Fresno City Attorney's Office 2600 Fresno Street, Suite 2031 Fresno, CA 93721
- **EMAILED TO:** [wagetheft@fresno.gov](mailto:wagetheft@fresno.gov)

**If no records are available, you MUST still send back the signed Affidavit.**

Please read all of the attached documents. If you have any questions, you may contact the issuing attorney or our office directly at 559-621-7599. If you require additional time to complete this request, please notify the issuing attorney or our office immediately.



Andrew Janz, City Attorney  
 By: Brandon Reta, Deputy City Attorney (339039)  
 City of Fresno-City Attorney's Office  
 2600 Fresno Street, Fresno, CA 93721  
 Phone (559)621-7599  
 Email brandon.reta@fresno.gov



TO:  
 The Janitorial Company  
 4887 W Pinedale Ave  
 Fresno, CA 93722  
 Mailing Address: PO Box 11847  
 Fresno, CA 93775

DEPOSITION SUBPOENA  
 FOR PRODUCTION OF BUSINESS RECORDS

CAO Case Number: WT25-0004

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:  
 To: Fresno City Attorney's Office Attn: Brandon Reta, Deputy City Attorney  
 At (time): 10:00 a.m.  
 On: (Date) October 13, 2025  
 Location (address): 2600 Fresno Street, Suite 2031, Fresno, CA 93721
2. The records are to be produced by the date and time shown in item 1 by delivering a true, legible, and durable copy of the business records described in item 3 to the address set forth above. The records shall be accompanied by an affidavit of the custodian of records or other qualified witness pursuant to California Evidence Code Section 1561.
3. The records that need to be generated are outlined as follows: For every employee, both current and former: comprehensive payroll and/or wage records, paystubs, check copies, pay rates, overtime rates, methods of payment, employee policies and procedures/employee handbooks, as well as tax information. Time frame: June 2022 – Present
4. Pursuant to City of Fresno Municipal Code Section 1-602(a), unless otherwise prohibited by federal or state law, in investigating, enforcing or prosecuting any matter where federal or state law grants or affords to the City Attorney, the duty or power to investigate, enforce, or prosecute any matter under federal or state law, the City Attorney shall have the power to inspect, upon reasonable notice, all papers, books, accounts, records, documents or other items that may be relevant to the City Attorney's investigation, enforcement action or prosecution. (b)The City Attorney shall also have the power to issue subpoenas for the attendance of witnesses, to compel their attendance and testimony, to administer oaths and affirmations, to take evidence, and to issue subpoenas for the production of any papers, books, accounts, records, documents or other items that may be relevant to the City Attorney's investigation, enforcement action or prosecution.  
 (Added Ord. 2024-010, § 1, eff. 5-10-24).

SEC. 1-603. - ENFORCEMENT.

DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

If any person refuses or fails to comply with a subpoena of the City Attorney issued pursuant to this Article, the City Attorney may petition any court of competent jurisdiction for an order compelling the person to attend and testify or produce the books, papers, records, accounts, documents, or other items required by the subpoena before the officer named in the subpoena.

Dated: 09/22/2025

ANDREW JANZ  
City Attorney

By: Brandon Reta  
Brandon Reta  
Deputy City Attorney

**DECLARATION OF CUSTODIAN OF RECORDS**

Records pertaining to: The records that need to be generated are outlined as follows: For every employee, both current and former: comprehensive payroll and/or wage records, paystubs, check copies, pay rates, overtime rates, methods of payment, employee policies and procedures/employee handbooks, as well as tax information. Time frame: June 2022 – Present

Name of Facility/Location:

Address:

Phone:

I, the undersigned, being duly authorized custodian of records or other qualified witness in the employ of the above-named business and having the authority to certify the records declare the following:

**CERTIFICATION OF RECORDS COPIED**

- That as of the day of this declaration, the attached  documents,  videos,  photos,  audio, as given to the Fresno City Attorney’s office, are a true copy of all records described in the Subpoena and/or Authorization which were kept and maintained by the facility in the usual course of business.
- That as of the day of this declaration, the attached  documents,  videos,  photos,  audio, as given to the Fresno City Attorney’s office, are a true copy of part of the records described in the Subpoena and/or Authorization which were kept and maintained by the facility in the usual course of business, with the exception of:

**CERTIFICATION OF NO RECORDS**

- That a thorough search of our files made by me or under my direction and control revealed no records, documents or things described in the Subpoena and/or Authorization. And, it is understood that this declaration is limited to the information supplied to me in the attached Subpoena and/or Authorization; such records may exist under another name, spelling or identifying date.
- Records described in the Subpoena and/or Authorization did exist, however these records are not available to copy because:
- UNABLE TO COMPLETE REQUEST BECAUSE:**

I DECLARE UNDER PENALTY OF PERJURY AND UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on \_\_\_\_\_, 2025, at Fresno, California.  
(Date)

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

[Decl-Custodian of Records]



Andrew Janz  
City Attorney

September 26, 2025

The Janitorial Company

4887 W Pinedale Ave. Fresno, CA 93722  
Mailing Address: PO Box 11847 Fresno, CA 93775

Re: City of Fresno's Wage Protection Program Investigation  
City Case Number WT25-0004

Dear The Janitorial Company,

We are following up on our previous subpoena request regarding employment records for the above business between: June 2022-Present.

We acknowledge receipt of your response to our prior subpoena; however, the documents provided were **incomplete** and **did not include all of the records requested**. As such, we are reiterating our request and formally requesting that you provide the following documentation, which employers are required to maintain pursuant to California Labor Code 226 and 1174:

1. Employees itemized wage statements (paystubs) for the period requested
2. Records showing total hours worked per day and pay period
3. Rates of pay (including any changes to rates)
4. Overtimes hours worked and compensation received
5. Deductions made from wages
6. Employee job classifications
7. Any other payroll or personnel records that pertain to employee wages and hours worked

As you are aware, Labor Code section 1174 requires that employers retain these records for a minimum of three years. Failure to provide these records may result in legal action.

City of Fresno  
Wage Protection Program  
(559) 621-7599

Please submit the complete set of records to the **Fresno City Attorney's Office 2600 Fresno Street, Suite 2031 Fresno, CA 93721** or via email to [wagetheft@fresno.gov](mailto:wagetheft@fresno.gov) by no later than **October 13, 2025**. If you require clarification, you may contact me directly.

Thank you for your prompt attention to this matter and appreciate your cooperation.

Sincerely,



Brandon Reta  
*Deputy City Attorney*

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# EXHIBIT D

**DECLARATION OF CUSTODIAN OF RECORDS**

Records pertaining to: The records to be produced are described as follows: All payroll documents and records including, but not limited to, payroll/wage records, paystubs, copies of checks, pay rate, overtime rate, payment methods, employee policy & procedure/employee handbooks, and tax information pertaining to all employees (currently & previously employed)  
Time period: June 2022 - Present

Name of Facility/Location: The Janitorial Company  
Address: 559-283-0223  
Phone: P.O. Box 11847 Fresno CA 93775-559-415-6873

I, the undersigned, being duly authorized custodian of records or other qualified witness in the employ of the above-named business and having the authority to certify the records declare the following:

**CERTIFICATION OF RECORDS COPIED**

- That as of the day of this declaration, the attached  documents,  videos,  photos,  audio, as given to the Fresno City Attorney's office, are a true copy of all records described in the Subpoena and/or Authorization which were kept and maintained by the facility in the usual course of business.
- That as of the day of this declaration, the attached  documents,  videos,  photos,  audio, as given to the Fresno City Attorney's office, are a true copy of part of the records described in the Subpoena and/or Authorization which were kept and maintained by the facility in the usual course of business, with the exception of:

**CERTIFICATION OF NO RECORDS**

- That a thorough search of our files made by me or under my direction and control revealed no records, documents or things described in the Subpoena and/or Authorization. And, it is understood that this declaration is limited to the information supplied to me in the attached Subpoena and/or Authorization; such records may exist under another name, spelling or identifying date.
- Records described in the Subpoena and/or Authorization did exist, however these records are not available to copy because:
- UNABLE TO COMPLETE REQUEST BECAUSE:**

I DECLARE UNDER PENALTY OF PERJURY AND UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on 8-1, 2025, at Fresno, California.  
(Date)

JAGTAR SINGH  
Printed Name

[Signature]  
Signature

[Decl-Custodian of Records]